

June 6, 2006

James M. Parker, PE
Manager, Compliance Services
PPL Montana, LLC
P.O. Box 38
Colstrip, MT 59323

Re: Comments on Montana's Draft CALPUFF Modeling Protocol for BART

Dear Mr. Parker:

Thank you for your recent comments on the draft Montana CALPUFF modeling protocol. As a reminder, the CALPUFF modeling protocol is not required to be formally adopted by the Montana Board of Environmental Review. However, the Montana Department of Environmental Quality (Department) solicited public comment so that all interested parties had an opportunity to review and comment on the modeling protocol as it applies to BART.

The Department intends to use this CALPUFF guidance for all long range modeling submitted for BART, NSR, and PSD. The guidance will be posted along with the other modeling guidance on the Department's Air Resources Management Bureau web site (<http://www.deq.mt.gov/AirQuality/Visibility.asp>). The guidance will be subject to change as needed. Your participation in this process has given us a strong start.

Comment 1: Application of Maximum Daily Actual Emissions

The BART guidelines published by the U.S. Environmental Protection Agency (EPA) require the use of maximum daily actual emissions. 70 FR 39103.

Comment 2: EPA Approval of Alternative BART Modeling Protocol

The Department is working with EPA and the federal land managers (FLMs) in the BART process. EPA is requesting review of any alternative BART modeling protocols requested by facilities with BART-eligible sources. EPA is aware of the Montana BART modeling schedule, so time constraints should not become an issue.

If you have source-specific PM₁₀ speciation data, the Department would greatly appreciate receiving a copy of that information. Please do not hesitate to contact me at (406)444-7305 or e-mail at bhabeck@mt.gov, if you have any questions or additional comments on the draft modeling protocol.

Sincerely,

Robert J. Habeck
AQ Policies & Planning
Science Program Supervisor
Air Resources Management Bureau